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Attorney for Defendants CONTINENTAL CENTRAL CREDIT, INC., a California Corporation and
 SAN CLEMENTE COVE VACATION OWNERS Association, a California Corporation.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

SALLIE A. DURHAM, an individual on behalf of herself and all others similarly situated,

Plaintiff,

vs.

CONTINENTAL CENTRAL CREDIT, INC.,
 a California Corporation and SAN
 CLEMENTE COVE VACATION OWNERS
 ASSOCIATION, a California Corporation;
 and DOES 1 through 10, Inclusive.

Defendants.

**DEFENDANTS' INITIAL DISCLOSURE
 PURSUANT TO FED. R. CIV P. 26(a)(1)(A-D)**

JUDGE: Honorable William McCurine, Jr.

Defendants CONTINENTAL CENTRAL CREDIT, INC. (hereinafter referred to as "CCC")
 and SAN CLEMENTE COVE VACATION OWNERS Association (hereinafter referred to as
 "Association"), (collectively, "Defendants") submits the following Initial Disclosure under Federal
 Rules Civil Procedure Rule 26(a) (1) (A-D).

Pre-Discovery Disclosure. The parties will exchange by September 19, 2008 the
 information required by Fed. R. Civ. P. 26(a)(1).

EXHIBIT 4

INITIAL DISCLOSURE

(1) Defendants list containing the names and addresses of each person likely to have discoverable information pursuant to Rule 26(a)(1)(A) are as follows:

a. Name: Richard F. Spielman,
President of Continental Central Credit, Inc.
Address: 5611 Palmer Way, Ste. G, Carlsbad, CA 92010
Phone Number: (800) 525-6000

Richard F. Spielman, President of Continental Central Credit, Inc. will testify to the collection rules and procedures of CCC, the assignment of plaintiff's account, the amount due and owing, CCC's business practices and the facts on how the collection costs are calculated.

b. Name: Marc Hubbard
Managing agent for San Clemente Cove Vacation Owner's Association
Address: 5900 Pasteur Ct., Ste 200, Carlsbad, CA 92008.
Phone Number: (760) 827-4189

Mr. Hubbard will testify to the Rules and Regulation of the Association managing an account, managing the assessments that are due and owing under the CC&R's, the notices that were sent and the Association's procedures.

c. Name: Jackie Simms
Continental Central Credit, Inc.
Assigned to collect on account.
Address: 5611 Palmer Way, Ste. G, Carlsbad, CA 92010
Phone Number: (800) 525-6000.

Jackie Simms, is a collector for CCC. Ms. Simms will testify to the collection of the account, notices sent and contact to the plaintiff that was made, and basic collection procedures.

(2) A description by category of all documents data compilations and tangible things in possession, custody or control of defendants pursuant to Rule 26(a)(1)(B):

a. Declaration of Covenants, Conditions, and Restrictions for Vacation Owner's of San Clemente Cove Resort, Orange County California, Recorded 9-19-1988 in official records of Orange County California, Document Number 88-347553.

b. Agreement between Continental Central Credit, Inc and San Clemente Cove Homeowners Association dated 10-9-2000.

c. "Homeowners Association Maintenance Fees and Billing Options", undated.

d. "Collections/Foreclosure Procedures and Maintenance Fees and Billing Options of San Clemente Cove Homeowners Association", undated.

e. "Statement of Facts regarding Continental Central Credit, Inc.", undated.

f. Electronic media file of Continental Central Credit, Inc, regarding File No.: 3067702.

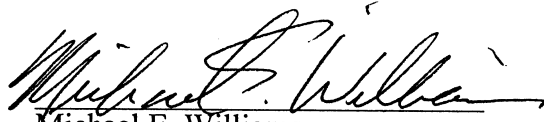
The location of all documents are at Defendant's counsel's office Michael E. William, 5611 Palmer Way, Ste. G-2, Carlsbad, CA 92010, Telephone No.: (760) 931-1748 and Fax No.: (760) 931- 0755.

(3) There is presently no computation of any category of damages claimed by the disclosing parties pursuant to Rule 26(a)(1) (C).

(4) There is no insurance policy available for inspection or copying pursuant to Rule 26(a)(1)(D).

Dated: September 18, 2008

Respectfully submitted,



Michael E. Williams,
Attorney for Defendants

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Attorney for Defendants CONTINENTAL CENTRAL CREDIT, INC., a California Corporation, SAN CLEMENTE COVE VACATION OWNERS ASSOCIATION, a California Corporation.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

SALLIE A. DURHAM, an individual on behalf of herself and all others similarly situated,

Plaintiff,

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CONTINENTAL CENTRAL CREDIT, INC.,
a California Corporation; SAN CLEMENTE
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and DOES 1 through 10, Inclusive.

Defendants.

) CIVIL ACTION
)
) CASE NO. '07 CV 1763 BTM-WMc
)
) **PROOF OF SERVICE**
)
) **Judge:** Honorable William McCurine, Jr.

I am employed in the City of Carlsbad, County of San Diego; I am over the age of eighteen years and not a party to the within action. My business address is 5611 Palmer Way, Ste. G-2, Carlsbad, CA 92010.

On September 18, 2008, I served the attached following documents:

**DEFENDANTS' INTIAL DISCLOSURE PURSUANT TO
FED. R. CIV. 26(a) (1) (A-D)**

1 on the interested parties in said action as follows:

2 Deborah L. Raymond, Attorney for Plaintiff
3 445 Marine View Avenue, Suite 305
4 Del Mar, CA 92014

Terryl B. O'Donnell, Esq.
7040 Avenida Encinas, 104-224
Carlsbad, CA 92011

4 [X] **BY MAIL** I placed each of the above referenced documents in a sealed envelope,
5 with postage thereon fully prepaid for first-class mail for collection and mailing at San
6 Diego, county of Carlsbad, California, following ordinary business practices. I am
7 familiar with the business' practice for collection and processing of correspondence
8 for mailing with the United States Postal Service pursuant to which practice the
9 correspondence will be deposited with the United States Postal Service this same day in
10 the ordinary course of business

11 [] **(BY CERTIFIED MAIL U.S. POSTAL SERVICE)** I placed each of the above
12 referenced documents in a sealed envelope, with postage thereon fully prepaid for
13 Express Mail, United States Postal Service for collection and mailing at San Diego,
14 County of Carlsbad, California, following ordinary business practices. I am familiar with
15 the business' practice for collection and processing of correspondence for mailing with
16 the United States Postal Service pursuant to which practice the correspondence will be
17 deposited with the United States Postal Service this same day in the ordinary course of
18 business.

19 [] **(BY PERSONAL DELIVERY)** Each such document was placed in a sealed
20 envelope and sent by attorney service to be hand delivered to the person or attorney listed
21 above.

22 [] **(BY ECF COURT FILING)** Notice was electronically mailed by filing through
23 ECF Court filing system to:

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct.

I, Janet Hartman, declare, under penalty of perjury, the foregoing is true and correct.
Executed on September 18, 2008, at Carlsbad, California 92010.

/s/ Janet Hartman
Janet Hartman

MICHAEL E. WILLIAMS
ATTORNEY AT LAW
5611 Palmer Way, Suite G2
Carlsbad, CA 92010
(760) 931-1748
Fax: (760) 931-0755

September 18, 2008

Deborah L. Raymond
Law Offices of Deborah Raymond
445 Marine View Avenue, Suite 305
Del Mar, CA 92014

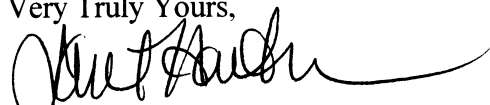
Re: Durham -vs-Continental Central Credit, Inc., et al.
Case No.: 07 CV 1763 BTM-WMc

Dear Ms. Raymond;

Please find enclosed Defendants Initial Disclosures Pursuant to Fed. R. Civ P. 26 (a) (1) (A-D).

If you have any further questions or comments, please do not hesitate to contact my office.

Very Truly Yours,



Janet Hartman, Paralegal for
Michael E. Williams, Esq.
Attorney At Law